

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 04-1205-SLR
	:	JURY TRIAL OF 12 DEMANDED
HARRY M. FREEMAN, M.D.,	:	
DONNA BURNS, DR., and	:	
MAJOR R. L. HUGHES,	:	
	:	
Defendants.	:	

**REQUEST FOR PRODUCTION OF
DEFENDANT, HARRY M. FREEMAN, M.D.
DIRECTED TO PLAINTIFF**

The defendant requests the plaintiff to produce for examination and copying at the office of the attorney for defendant on or before thirty (30) days from receipt of this Request:

1. All documents referred to in Plaintiff's Answers to Interrogatories 1-19 filed simultaneously hereto.
2. Copies of all documents which are relevant, in whole or in part, to plaintiff's claim for personal injuries (including but not limited to medical reports and records).
3. Copies of all documents which are relevant, in whole or in part, to plaintiff's claim for lost wages.
4. If you claim any loss of income, loss of future income or impairment of earning capacity in this lawsuit, please produce your Federal and State income tax returns for the years 1980 through the present.
5. Copies of all bills and receipts evidencing payment of bills for which the plaintiffs seek compensation in this lawsuit.

6. Copies of the curriculum vitae of all experts you intend to call at trial.

ELZUFON, AUSTIN, REARDON,
TARLOV & MONDELL, P.A.

/S/Jeffrey M. Austin
JEFFREY M. AUSTIN, ESQUIRE #2158
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Attorney for Defendant,
Harry M. Freeman, M.D.

Dated: December 12, 2005

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AFFIDAVIT OF SERVICE

STATE OF DELAWARE)
) SS.
NEW CASTLE COUNTY)

I, KAREN BRYSON LEWIS, secretary to JEFFREY M. AUSTIN, ESQUIRE, in the law firm of Elzufon Austin Reardon Tarlov & Mondell, P.A., do hereby certify that on the 10th day of February, 2003, two copies of the attached ***DEFENDANT, HARRY M. FREEMAN, M.D.'S, INTERROGATORIES DIRECTED TO PLAINTIFF and REQUEST FOR PRODUCTION*** were mailed to the following individual(s):

Jeffrey Alonzo Simms
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Carvel State Office Building
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/S/Karen Bryson Lewis
KAREN BRYSON LEWIS

SWORN TO AND SUBSCRIBED before me, a Notary Public, this 9th day of
December, 2005.

/S/Robin R. Robinson
NOTARY PUBLIC